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August 1, 2003

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Via Hand Delivery

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554

> Re: Virginia Cellular LLC dba Cellular One E911 Interim Report

Dear Ms. Dortch:

Virginia Collular LLC ("Virginia Collular") hereby files its E911 Interim Report regarding its wireless Enhanced 911 (E911) deployment and implementation status. Virginia Cellular, as a Tier III who is employing a handset-based technology, must begin selling and activating locationcapable handsets no later than September 1, 2003 and must ultimately ensure that penetration of location-capable handsets among its subscribers reaches 95 percent no later than December 31, 2005. 47 C.F.R. § 20.18(g)(1). Further, once a PSAP request is received, Virginia Cellular is required under the Commission's rules to begin delivering Phase II E911 service to the PSAP by September 1, 2003 or within six (6) months from the PSAP request, whichever is later. 47 C.F.R. § 20.18(g)(2).

Virginia Cellular recognizes the public safety importance of Phase II E911 service. Virginia Cellular provides wireless service in rural Virginia and currently operates on a CDMA network. As set forth below, Virginia Cellular provides its responses to the information requested by the Wireless Telecommunication Bureau in its Public Notice released June 30, 2003 (Public Notice, DA 03-2113, Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers).

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid).

Virginia Cellular deployed Phase I service in Harrisonburg/Rockingham County in November 2002. It is currently in the process of deploying Phase I service in the cities of Staunton and Waynesboro and the counties of Augusta and Nelson. Virginia Cellular has received a Phase II request from Harrisonburg/Rockingham County.

2. The carrier's specific technology choice (*i.e.*, network-based or handset-based solution, as well as the type of technology used).

At this time, Virginia Cellular plans on deploying a handset-based solution.

3. Status on ordering and/or installing network equipment.

Virginia Cellular's CDMA network employs Motorola equipment. At this time, Motorola does not have a Phase II solution for Virginia Cellular's network. Nonetheless, Virginia Cellular has taken the following steps toward Phase II compliance: It has installed the Visiting Location Register (VLR) necessary for its IS41 conversion and is in the process of transitioning carriers. The VLR allows enhanced messaging required to complete E911 Phase II phone calls for roaming customers. It has ordered from Motorola the Home Location Register (HLR) to allow enhanced messaging for our home subscribers.

4. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.

Virginia Cellular currently sells the following ALI-capable handset: Motorola V120E. It also anticipates selling the following ALI-capable handsets: Motorola T720 (tentative release date 8/03), Motorola V60X (tentative release date 9/03), Nokia 3586I (tentative release date 7/03). Finally, both Nokia and Motorola have indicated that there should not be a problem in the future obtaining phones that are ALI-capable.

5. The estimated date on which Phase II service will first be available in the carrier's network.

Virginia Cellular estimates that Phase II service will first be available in its network by November, 2004.

6. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

Virginia Cellular anticipates being able to meet the December 31, 2005 deadline.

In the event you have any questions with respect to this matter, please contact the undersigned.

Sincerely,

David A. LaFuria
Todd Slamowitz

<u>AFFIDAVIT</u>

County of Augusta)	
)	SS:
State of Virginia)	

- I, William N. Braley, having been first duly sworn, depose and state as follows:
- 1. I am Vice President for Virginia Cellular LLC.
- 2. I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.

I declare under penalty of perjury that the foregoing is true and correct.

William N. Braley
Vice President

Virginia Cellular LLC

Subscribed to and sworn to before me This 28th day of July, 2003.

Notary Public

My commission expires: April 30th, 2007

CERTIFICATE OF SERVICE

I, Steven McCord, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1st day of August, 2003, delivered a copy of the foregoing Enhanced 911 Tier III Interim Report to the following:

John Muleta, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
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Washington, D.C. 20554

David Solomon, Chief* Enforcement Bureau Federal Communications Commission 445 12th Street, S.W., Room 7-C723 Washington, D.C. 20554

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^{*}via hand-delivery